



TULARE IRRIGATION DISTRICT

6826 Avenue 240 ♦ Tulare, California 93274 ♦ Telephone (559) 686-3425

September 7, 2011

Manucher Alemi
Chief, Water Use and Efficiency Branch
Department of Water Resources
901 P Street
Sacramento, California 95814

Subject: Comments on Material Presented to A1 Subcommittee on August 31, 2011

Dear Mr. Alemi:

The Tulare Irrigation District (District) appreciates the opportunity to comment on the materials and discussion that were handed out and discussed at the A1 Subcommittee meeting on August 31, 2011. The measurement of water efficiency is a very complicated and often misinterpreted topic, and the District is very pleased to be a part of the discussions that the Department of Water Resources is hosting on this topic. The District has two comments that we wish to make regarding the material.

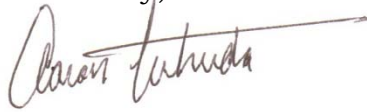
First, the development of the table titled "Potential Methods for Quantifying the Efficiency of Agricultural Water Use" (Methods Table) is a good measure of the potential avenues for measuring agricultural water use efficiency. In reviewing the Methods Table the District would also like to recommend that DWR evaluate the following criteria to potentially be included as variables for consideration:

- Soil Type
- Evaporation
- Wind
- Application Method
- Farm Management Practices

Secondly, the District would like to discuss the issue that was raised at the end of the meeting. Spreck Rosencrants with the Environmental Defense Fund brought up the topic of "crop per drop," which was discussed at an earlier ASC meeting in the form of economic efficiencies of water application. The District does not feel it is appropriate for this method of measurement to be introduced. The principles behind the economics of growing a crop are numerous and include such things as family farming practices, variable weather patterns and access to appropriate business functions. Mr. Rosencrants alluded that the intent of this type of analysis is to determine what farmers should be growing based on water usage. The District believes that this oversteps the boundaries of a free market and will surely be devastating to farming as a business and as a way of life.

Again the District appreciates the opportunity to provide comments in this process. If you have any questions or comments, please feel free to contact me a (559) 686-3425 or via email at akf@tulareid.org.

Sincerely,

A handwritten signature in dark ink, appearing to read "Aaron Fukuda", with a long horizontal flourish extending to the right.

Aaron Fukuda
District Engineer